

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE \$72,762.00 U.S. Currency
et al; CATS Nos. 21-FBI-000128;
21-FBI-000131

Misc. No.: 21-mc-50916
Honorable David M. Lawson

**Stipulation to Extend United States' Time to File a
Forfeiture Complaint and to Toll the Civil Filing Deadline**

It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and Administrative Claimant Jameela Thomas, by and through her attorney, as follows:

1. On October 6, 2020, the Federal Bureau of Investigation ("FBI") seized the following property from the residence of Jameela Thomas and her husband Janard Thomas:
 - a. \$72,762.00 U.S. Currency (21-FBI-000128);
 - b. One (1) 18kt yellow gold Rolex DateJust Mid-Size automatic watch; Model 68278 (21-FBI-000131); and
 - c. One (1) 10kt yellow gold cuban link necklace, 8.85mm wide x 20" long, double safety clasp (21-FBI-000131).

(collectively referred to herein as the "Property").

2. The Parties acknowledge and stipulate that the FBI provided notice as required by 18 U.S.C. § 983(a)(1)(A) of the seizure and its intent to

administratively forfeit the Property to all known interested parties, including to Jameela Thomas.

3. Jameela Thomas filed a claim in the administrative forfeiture proceeding with the FBI regarding the Property. No other person has filed a claim to the Property in the administrative forfeiture proceeding.

4. The FBI referred the administrative claim to the United States Attorney's Office for civil judicial forfeiture proceedings.

5. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), within 90 days after a claim has been filed in an administrative forfeiture proceeding, the United States is required to do one of the following:

(a) file a complaint for forfeiture against the claimed property,

(b) return the claimed property, or

(c) include the claimed property for forfeiture in a criminal action,

in order for the United States to take further action to effect the civil forfeiture of the claimed property in connection with the underlying offense, unless the court extends the deadline for good cause shown or by agreement of the parties. In this case, the 90-day deadline would be **July 6, 2021**.

6. On May 25, 2021, the Property was listed in a Forfeiture Bill of Particulars and identified for criminal forfeiture in a criminal case in which Jameela Thomas's husband, Janard Thomas, is one of the defendants: *United*

States v. Janard Thomas, et. al., 20-20392, Case No. 20-cr-20392 (ECF No. 131), pending in the United States District Court for the Eastern District of Michigan before the Honorable Bernard A. Friedman.

7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Property.

8. Jameela Thomas knowingly, intelligently, and voluntarily gives up any rights she may have under 18 U.S.C. § 983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property and/or to return the Property on or before July 6, 2021.

9. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property and/or return the Property to toll the civil filing deadline shall be extended **90 days** from the conclusion of the criminal case pending against Janard Thomas in the United States District Court for the Eastern District of Michigan, *United States v. Janard Thomas, et. al.*, 20-20392, either by conviction and entry of Judgment, dismissal of the charges against him, or acquittal on all charges against him.

10. Jameela Thomas waives all constitutional and statutory challenges related to the foregoing extension and gives up any rights she may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Jameela Thomas further waives and agrees to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

11. Jameela Thomas agrees that until the United States files a complaint for forfeiture against the Property or until 90 days after the conclusion of the previously mentioned criminal case, *United States v. Janard Thomas, et. al.*, 20-20392, whichever occurs first, the Property shall remain in the custody of the United States and she shall not seek its return for any reason in any manner.

12. By signing below, Todd Perkins, Esq. declares that prior to signing this Stipulation, he provided a copy of it to Jameela Thomas, reviewed it with her, consulted with her regarding its contents, answered any questions she had about it, determined that she understands its terms and is aware of her rights in this matter, and Jameela Thomas authorized Mr. Perkins to sign this Stipulation.

13. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Based upon the foregoing, and the record in this case, the Parties respectfully request this Court to enter the Order Extending United States' Time to File a Forfeiture Complaint and to Toll the Civil Deadline, which will be submitted to the Court via ECF utilities.

Approved as to form and substance:

Saima S. Mohsin
Acting United States Attorney

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Dated: June 22, 2021

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Dated: June 24, 2021

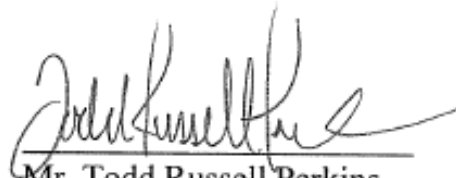
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Dated: 6/24, 2021